

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

KATHLEEN P. MULLINIX,

Plaintiff,

V.

KIKI BOGORAD-GROSS and LEONARD P. BOGORAD, As They Are Executors of the Will of Lawrence Bogorad,

Defendants.

Civil Action No. 04-12684-WGY

**PLAINTIFF KATHLEEN P. MULLINIX'S
MOTION FOR LEAVE TO EXCEED THE PAGE LIMIT**

Plaintiff Kathleen P. Mullinix, through counsel, hereby moves, pursuant to Local Rule 7.1(B)(4), for leave to exceed the twenty-page limit for memoranda supporting allowance of motions, and file its Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment and in Support of Plaintiff's Cross-Motion for Summary Judgment ("Memorandum"), which is **[23]** pages in length. As grounds for this Motion, Ms. Mullinix states the following:

1. Ms. Mullinix’s Memorandum addresses the Defendants’ Motion for Summary Judgment on all nine counts in the Complaint, as well as her Cross-Motion for Summary Judgment which became viable after reviewing the facts the Defendants did not dispute in their Motion.

2. The number of claims and the breadth of the undisputed factual record require extensive discussion.

3. Ms. Mullinix has attempted to present the arguments in her Memorandum in the most efficient manner possible.

WHEREFORE, for the foregoing reasons, Ms. Mullinix respectfully requests that this Court: (1) grant her request for leave; and (2) grant such other relief as the Court deems just and appropriate.

LOCAL RULE 7.1 CERTIFICATION

I, Sara E. Solfanelli, hereby certify that I have conferred with counsel for the Defendants before filing this Motion, **and counsel has agreed to a 23 page memorandum.**

Respectfully submitted,

KATHLEEN P. MULLINIX,
By her attorneys,

/s/ Sara E. Solfanelli

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Date: June 19, 2006

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on June 19, 2006.

/s/ Sara E. Solfanelli